



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties
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March 26, 2007

CERTIFIED MAIL

Mr. Charles J. Muscato, President
MetalTek Industries, Inc.
Facility ID #: 0812100417
829 Pauline St.
Springfield, Ohio 45501

WARNING LETTER

Dear Mr. Muscato:

On March 15, 2007, The Regional Air Pollution Control Agency (RAPCA), conducted an inspection at MetalTek Industries, Inc (MetalTek) located at 829 Pauline St. in Springfield, Ohio. The following issues were noted during the March 15, 2007, RAPCA inspection:

I. Failure to Operate a Continuous Temperature Recorder

Permit to Install (PTI) 08-01027 and the Permit to Operate (PTO) require the temperature of the afterburner control of burn-off oven N005 to be 1350 degrees Fahrenheit or greater. PTI 08-01832 and the PTO require the temperature of the afterburner control of burn-off oven N006 to be 1350 degrees Fahrenheit or greater. PTI 08-04056 and the PTO require the temperature of the afterburner control of burn-off oven N007 to be 1250 degrees Fahrenheit or greater. Emissions units N005, N006, and N007 are all required to operate and maintain a continuous temperature monitor and recorder which continuously measures and records the temperature in degrees Fahrenheit for each over afterburner.

During the inspection on March 15, 2007, it was noted that while the afterburners of N005, N006 and N007 were equipped to monitor the temperature continuously, MetalTek failed to have the equipment installed that can continuously record the afterburner temperatures as required. RAPCA was informed that the temperature chart recorder was recently removed from service for repairs. Failure to operate a continuous temperature chart recorder for the afterburners of emissions units N005, N006 and N007 is a violation of the terms and conditions of the respective PTI, PTO and Ohio Revised Code (ORC) 3745.05.

II. Afterburner Continuous Temperature Records

During the inspection conducted on March 15, 2007, Metal Tek was unable to provide records of the recorded temperatures for the afterburner control for the year 2006, with the exception of

January and March 2006. 2007 records were also unavailable for RAPCA review. The temperature records reviewed for the months of January and March 2006 contained many data points which were illegible or missing. Failure to properly monitor and record the temperature of the afterburners on emissions units N006, N007 and N007 while the burn off ovens are in operation is a violation of the terms and conditions of the respective PTI, PTO and the Ohio Revised Code (ORC) 3704.05.

III. Failure to Maintain a Deviation Log

The PTIs and PTOs for N005, N006, and N007 state that "the permittee shall maintain a log of periods of time when the emissions unit is in operation and the afterburner temperature was less than 1350 degrees Fahrenheit for N005 and N006, and less than 1250 for N007." MetalTek has not, and is not maintaining a log that clearly states the operational status of the burn off ovens when the temperature of the afterburner controls are below the required temperatures. Operation of the burn off ovens while the afterburner control is below the required temperatures is a violation of the PTI, PTO and ORC 3745.05. Failure to maintain a log of all periods of time when the emissions units are in operation and the afterburner temperature is less than the required temperature is a violation of the PTI, PTO and ORC 3704.05.

IV. Failure to Submit Proper Deviation Reports and Lack of 2006 Annual Report

The PTIs and PTOs for N005, N006, and N007 state "the permittee shall notify the...local air agency...in writing of any record of deviation of the afterburner control temperature below 1250 degrees Fahrenheit (for N007) or 1350 degrees Fahrenheit (for N005 and N006) within 45 days after the deviation occurs." These deviation reports are to include deviations that occur as a result of a low temperature measured at the afterburner during oven operation, missing data or any times when MetalTek is operating the oven and does not have data to document the afterburner is at the required temperature. Past deviation reports that have been submitted to RAPCA for the ovens have been quarterly reports that state there have been no deviations during 2006. MetalTek is to locate the missing 2006 and 2007 temperature records for emissions units N005, N006 and N007 and complete a review of the data. Following the location of the missing temperature records MetalTek shall review and determine if any deviations have occurred. Deviation reports should be submitted to RAPCA that report all times when either the afterburners are below the allowable temperature when the burn off ovens are in operation, including any corrective action taken, and for periods of time where there is no documentation of the temperature of the afterburners during oven operation. In the future all reports of deviations shall be submitted as stated in your PTOs for these units and all deviations are to be reported within 45 days of the occurrence of the deviation. In Addition, no annual report was submitted for N007 for the calendar year 2006 as required by Special Term and Condition D.1 of the PTO . Failure to submit proper deviation and annual reports is a violation of the PTI, PTO and RC 3704.05.

V. Failure to submit PTO renewal application for N007

The PTO for emissions unit N007 expired on November 30, 2006 and a PTO renewal application

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has not been received. Failure to submit PTO renewal applications prior to expiration of an existing PTO is a violation of Ohio Administrative Code (OAC) and Clark County Combined Health District Air Pollution Control Regulations (CCCHDAPCR) rules 3745-35-02(A) and (B).

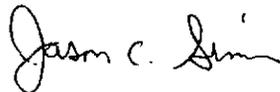
Following the inspection on March 15, 2007 the RAPCA representative meet with MetalTck officials and agreed to the following time schedule for follow-up.

Within 14 days receipt of this letter, MetalTek is to respond in writing to confirm a decision to repair the existing recorder or purchase a new recorder, keeping in mind that the equipment must be capable of measuring and recording temperature continuously. Report to RAPCA whether or not misplaced records for 2006 and 2007 have been located and if so, indicate that they are available for RAPCA review. **A Permit to operate application and annual report for N007 must be included in your response.**

Within 30 days receipt of this letter, RAPCA requires that MetalTek submit a compliance plan and schedule to bring the ovens into compliance with all applicable air pollution control regulations. At a minimum, the compliance plan shall address the specific action items and time table that MetalTek will implement to bring the ovens into compliance and correct all the violations cited above. MetalTek shall ensure that any deviations of the temperature requirements of the afterburners on N005, N006 and N007 are properly reported in a deviation report following review of the 2006 and 2007 temperature records. The compliance plan and schedule for the ovens shall be submitted expeditiously, but **no later than thirty days after receipt of this letter.**

If you have any questions regarding this matter, please contact Jason Simon or Jeff Canan at (937) 225-4435.

Sincerely,



Jason C. Simon
Air Pollution Control Specialist
Abatement Unit

cc: Lisa Holscher, USEPA
Tom Kalman, OEPA
Jefferis Canan, RAPCA